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*Attorneys for Defendants Ripple Labs Inc.,
XRP II, LLC, and Bradley Garlinghouse*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION

Case No. 4:18-cv-06753-PJH

This Document Relates to:

ALL ACTIONS

**DECLARATION OF ANA GUARDADO
IN SUPPORT OF LEAD PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL MATERIALS RELATING
TO LEAD PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION**

1 I, Ana Guardado, declare as follows:

2 1. I am Litigation Director at Ripple Labs Inc. I make this declaration in support of
3 Lead Plaintiff's Administrative Motion to File Under Seal Materials Relating to Lead Plaintiff's
4 Reply in support of Motion for Class Certification ("Motion to Seal"), Dkt. 218. Based on my
5 personal experience, knowledge, and review of the files, records, and communications in this
6 case, I have personal knowledge of the facts set forth in this Declaration and, if called to testify,
7 could and would testify competently to those facts under oath.

8 2. Lead Plaintiff's Motion to Seal seeks to redact portions of Plaintiff's Reply in
9 support of Motion for Class Certification, supporting declaration, and 5 exhibits (the "Protected
10 Materials"), described in greater detail below. Defendants Ripple Labs Inc., XRP II, LLC, and
11 Bradley Garlinghouse (collectively, "Ripple") designated these documents as
12 "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY" under the
13 Stipulated Protective Order as Modified by the Court ("Protective Order"), Dkt. 143. I now
14 submit this declaration in support of the Motion to Seal.

15 3. I have reviewed each portion of the Protected Materials, which contain
16 information Ripple considers to be highly sensitive and confidential information, the disclosure
17 of which could result in competitive harm to Ripple. I submit that the Protected Materials should
18 be sealed for the reasons set forth in the below chart:

Type of Material Defendants Seek to Seal	Page/Paragraph/Exhibit Numbers to be Redacted or Sealed in Full
Documents or portions thereof describing or providing detailed information on trade secret business information and highly sensitive internal strategy information, disclosure of which would be very likely to result in unjustified competitive harm.	Reply in support of Motion for Class Certification at 6, 9, and 15; N. Spear Decl. at ¶ 9, 10, and 11; Exhibits 70, 72, 73, and 74.

26 4. Ripple respectfully requests that the Court grant the Motion to Seal and allow the
27 Protected Materials to remain under seal.
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1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th
2 day of April, 2023, in San Francisco, California.

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6 Ana Guardado
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